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Verizon Wireless Privacy Principles

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Introduction

Wireless communications and Internet technology are changing the way all companies do business - and changing the way they collect and use information about their customers. Used responsibly, that information can help companies serve customers better. At Verizon Wireless, however, we realize that advances in wireless communications technology, especially the advent of wireless location technology, bring growing concerns - by customers and policymakers - about how customer information is used and shared.

Verizon Wireless takes your privacy concerns very seriously. We have always been guided by strong codes governing the privacy of your communications and information. Our Privacy Principles reflect our commitment and define our policy on safeguarding your privacy. We believe that these Principles strike a reasonable balance of customer concerns about privacy with your interest in receiving quality service and useful new products. This is especially important at a time when emerging wireless communications services present us with new business opportunities and new challenges to protect customer privacy.

We recognize that you may have varying concerns regarding the information we obtain about you. Our Principles give you choice and flexibility regarding how we use that information. And these Principles guide our employees in handling customer information so that your private information remains private.

At Verizon Wireless, we are committed to safeguarding your privacy, and we require companies we do business with to protect your privacy too. We put customers first.

Explanation of the Privacy Principles

These Principles apply to our use of "personally identifiable information"; that is, information about individual customers. Information that does not reveal a customer's identity is not personally identifiable information. For example, non-personally identifiable information, such as how many customers purchase a particular service in a particular state or how many users visit a web site on a particular day, does not raise privacy concerns and is not covered by these Principles. Below, we provide an explanation of each Principle and list some examples to give you and our employees a sense of how we apply them. The examples are intended to be illustrative, not all-inclusive.

These Principles are subject to change over time. We will revise and update these Principles if our practices change or if changes in the law require us to do so.

Our Privacy Principles

Information Collection and Use

- **We obtain and use your personally identifiable information for business purposes only.**

We obtain personally identifiable information about you that helps us to provide you with our services. We may also use this information to protect customers, employees and property against fraud, theft or abuse, to conduct industry or consumer surveys and to maintain good customer relations.

We may ask you questions to better serve your special needs and interests. For example, we may ask whether you work at home, whether any members of your household have special needs or whether teenagers reside in your

household in order to determine whether you may be interested in certain services. For training or quality assurance, we may also monitor or record our calls with you.

- **We inform you how personally identifiable information we obtain about you is used, as well as your options regarding its use.**

Our Customer Agreement contains disclosures about personally identifiable information that we are required to protect under federal law, how and when we use this information, when we may disclose it and ways you can restrict how we use or disclose it. We may also include information about the privacy implications of individual products and services in the terms and conditions for those products and services. These terms and conditions typically are found in the printed brochures for particular products or services, or sometimes you may view them on our websites, or electronically the first time you use the products or services.

Our [Internet Privacy Policy](#), which you can find at our web site, [verizonwireless.com](#), explains how we obtain personally identifiable information from users of our online services, including what kind of information we obtain, how we obtain it (e.g., through registration or through automatic means) and how we use it.

- **We give you opportunities to control how and if we use your personally identifiable information to sell you products and services.**

You have many opportunities to control how we use your personally identifiable information to introduce you to new products and services. For example, Verizon Wireless will not call you to market products and services if you have expressed to us a preference not to be called for such purposes. For more information on our [Do Not Call Policy](#), see [verizonwireless.com](#). You can also request not to receive other forms of marketing information, such as by direct mail, e-mail or text message, simply by calling us.

However, we do use personally identifiable information internally for our own general marketing and planning purposes - so that we can, for example, develop, test and market new products and services that meet the needs of our customers. Ordinarily, such information is combined into aggregations that do not include personally identifiable information.

Disclosure of Personally Identifiable Information

- **We enable you to control how and if we disclose your personally identifiable information to other persons or entities, except as required by law or to protect the safety of customers, employees or property or except when we share such information with agents, affiliates, suppliers, vendors, consultants and contractors who use it to provide or support our products and services.**

Subject to these exceptions, we will share your personally identifiable information with persons or entities outside the company only when you have consented.

An example of when we would disclose personally identifiable information to an outside person or entity is when we are served with a subpoena for customer information. In such cases, we are required to release the information. Another example would be if we share personally identifiable information with other carriers and/or with law enforcement to prevent and investigate fraud and other unlawful use of communications services. A third example would be if we share with our affiliates personally identifiable information related to products or services you currently receive from them or us.

Accuracy of Personally Identifiable Information

- **We strive to ensure that the personally identifiable information we use about you is accurate.**

We are committed to ensuring that the personally identifiable information we use about customers is accurate. To that end, we strive to verify that our customer records are correct. If you find an error in your Verizon Wireless bill, please notify us so we can correct it. Our service representatives are trained to answer questions about, and to give you reasonable access to, the information we have about you. Our service representatives will also provide explanations of how we use this information and how to correct any inaccuracies if they occur.

Privacy and Verizon Wireless Services

- **We consider privacy implications as new services are planned and introduced.**

We offer several privacy-enhancing services, including Caller ID and Per Call Blocking.

At Verizon Wireless, we are committed to expanding the world of communications and multimedia for customers - a world of wireless solutions...voice, video and data services...information and entertainment. We will investigate and consider privacy implications when developing new services.

- **We understand and are sensitive to the special concerns of customers and policy makers with respect to wireless location services and their privacy implications.**

We support notice and informed consent for the use of any personally identifiable wireless location and transactional information. We will not store this type of information beyond its normal useful life, including for internal service evaluation and quality assurance purposes, except as required by law.

- **We do not support or participate in the development of a national wireless phone number directory.**

We do not publish directories of our customers' phone numbers, and we do not provide or make them available to third parties for listing in directories.

Compliance With Laws and Public Policy Participation

- **We support consumer, government and industry efforts to identify and resolve privacy issues.**

We participate in legislative and regulatory proceedings, industry association efforts, consumer group efforts and general business group activities relating to telecommunications privacy issues.

- **We comply with all applicable privacy laws and regulations wherever we do business.**

Customer and policymaker perceptions of privacy have changed over time and will continue to do so. Changes in technology can also alter what is appropriate in protecting privacy. Laws may change accordingly. We will regularly examine - and update, if necessary - these Principles.

We consider privacy laws and regulations to be the minimum standards we adhere to in protecting privacy. In addition to complying with these laws and regulations, we also adhere to these Principles wherever we do business.

We also have taken additional voluntary measures to affirm our commitment to safeguarding your privacy. For example, we adhere to the CTIA Consumer Code for Wireless Service, we are a licensee of the TRUSTe Website Privacy Program and our web site meets the BBBOnLine's Reliability Program Standards.

- **We comply with all applicable laws and regulations regarding 'spam' and use commercially reasonable efforts to combat wireless 'spam'.**

We supported the passage of federal legislation aimed at providing consumers with control over receipt of unsolicited electronic messages, or 'spam'. We employ tools in our network to detect incidences of 'spam' sent to our customers' wireless devices, and we also provide customers with tools to manage and even restrict receipt of such messages. We may take legal action against 'spammers' who abuse our network.

Implementation

- **Our employees are responsible for safeguarding your communications and personally identifiable information.**

Our Code of Business Conduct, which is distributed to all employees and can be found at verizonwireless.com, requires our employees to be aware of and protect the privacy of all forms of your communications - whether they are voice, data or image transmissions - as well as your personally identifiable information. The Code makes clear that employees who fail to follow these Principles will face disciplinary action, which can include dismissal. Employees are trained regarding their responsibilities to safeguard your privacy.

We strive to ensure that information we have about you is secure and confidential, and to ensure that our employees comply with these Principles. We do not tamper with, intrude upon or intentionally disclose the existence or contents of any communication or transmission, except as required by law or the proper management of our network, or with your consent. Our policy is to limit access to databases containing personally identifiable information to employees, agents, affiliates, suppliers, vendors, consultants and contractors who need it to perform their jobs and in order to serve you - and they are contractually obligated to protect that information. We use safeguards to increase data accuracy and to identify and authenticate the sources of customer information. We use locks and physical security measures, sign-ons and password control procedures and internal auditing techniques to protect against unauthorized use of terminals and entry into our data systems.

We encourage our employees to be proactive in implementing and enforcing these Principles. If employees become aware of practices that raise privacy concerns, they are encouraged to report them to their supervisors or to contact Verizon Wireless' Compliance Hotline.

- **We are responsible for implementing these Principles and informing those third parties that provide services to us or to you about our privacy practices.**

We expect any vendors and consultants we hire, as well as our agents, affiliates, suppliers and contractors, to observe these Principles with respect to any personally identifiable information of our customers. They will be held accountable for their actions.